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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

**LISAMARIA MARTINEZ,**

Plaintiff,

v.

**COUNTY OF ALAMEDA, ,**

Defendant.

Case No. 3:20-cv-06570-TSH

**JOINT NOTICE OF SETTLEMENT,  
STIPULATION FOR DISMISSAL, AND  
[PROPOSED] ORDER**

**JOINT NOTICE OF SETTLEMENT AND STIPULATION FOR DISMISSAL**

TO THE COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that Plaintiff Lisamaria Martinez and Defendant County of Alameda have reached a full settlement of this action and have executed a Settlement Agreement and Release. The Settlement Agreement expressly provides that the settlement “shall have no impact on the Permanent Injunction, which remains in place with full force and effect.” (Settlement Agreement §I(c), attached as **Exhibit A.**)

Accordingly, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Parties stipulate and agree as follows:

- That this action shall be dismissed with prejudice as to all claims between Plaintiff Lisamaria Martinez and Defendant County of Alameda;
- That, subject to the Court’s approval, all pending deadlines and hearings in this matter shall be vacated and the case closed; and
- That the Court enter such further relief as the Court deems appropriate, including retaining such jurisdiction as the Court deems necessary to enforce the terms of the parties’ Settlement Agreement if enforcement becomes necessary.

A proposed order for the Court’s consideration, consistent with the terms of the Settlement Agreement, accompanies this Joint Notice of Settlement and Stipulation for Dismissal.

Respectfully submitted,

DATED: December 1, 2025

TRE LEGAL PRACTICE

/s/ Kristopher A. Nelson

Kristopher A. Nelson  
*Attorneys for Plaintiff*

Respectfully submitted,

DATED: December 1, 2025

ORBACH HUFF & HENDERSON LLP

/s/ Kevin E. Gilbert

Kevin E. Gilbert  
*Attorneys for Defendant*